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Attorneys for Defendant
 JPMorgan Chase Bank, N.A.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

ELIZABETH GRANADOS, an individual,

Plaintiff,

v.

BANK OF AMERICA, N.A. a business entity;
 JPMORGAN CHASE BANK, a business entity;
 and DOES 1-50, inclusive,

Defendants.

Case No. 4:18-CV-05535-KAW

[Assigned to the Hon. Kandis A. Westmore]

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING STAY OF
 PROCEEDINGS PENDING REVIEW OF
 LOAN MODIFICATION APPLICATION**

Pursuant to Civil Local Rules 6-2, 7-1, and 7-12, Plaintiff Elizabeth Granados (“Plaintiff”) and Defendants Bank of America, N.A. and JPMorgan Chase Bank N.A. (“Defendants”) (collectively the “Parties”) hereby stipulate as follows:

Plaintiff filed this action against Defendants on August 8, 2018 and served Defendants on or about August 9, 2018.

Defendants removed this action on September 10, 2018.

The Parties have twice stipulated to expand the time allowed for Defendants to respond to the Complaint.

Defendants have a deadline to respond to the complaint by November 13, 2018.

The Initial Case Management Conference is set for December 11, 2018. This stipulation will affect that date.

1 Plaintiff has requested that Defendant Chase review a new application for loan
2 modification and Chase has agreed to review that modification request.

3 All Parties recognize that reviewing Plaintiff's application for loan modification may
4 resolve all issues currently before this Court.

5 The time necessary to perform a review of Plaintiff's loan modification application would
6 interfere with the currently established deadlines in this matter.

7 The parties agree that a stay of this litigation is appropriate to preserve their and judicial
8 resources during the pendency of the loan modification application and review process.

9 NOW THEREFORE, in an effort to avoid unnecessary motion practice, the Parties,
10 through their undersigned counsel, hereby stipulate as follows:

- 11 1. This case shall be stayed pending review of Plaintiff's loan modification
12 application.
 - 13 2. Plaintiff, through counsel, will provide a completed loan modification application
14 within 5 business days of the filing of this stipulation.
 - 15 3. All currently scheduled deadlines in this matter shall be set aside pending a
16 motion, filed by either party, requesting the stay be lifted. If no motion seeking to
17 lift the stay is filed by March 1, 2019, the parties will file a joint case management
18 statement to update the Court on the status of this litigation.
 - 19 4. The initial case management conference shall be continued to a date the Court is
20 available after March 1, 2019.
 - 21 5. If a motion is filed by either party seeking to lift the stay, Defendants will have 30
22 days from the date of any order lifting the stay to respond to the Complaint.
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Dated: November 1, 2018

SHAPERO LAW FIRM
SARAH SHAPERO
JESSICA GALLETTA

By: /s/ Sarah Shapero
Sarah Shapero

Attorneys for Plaintiff
ELIZABETH GRANADOS

Dated: November 1, 2018

DAVIS WRIGHT TREMAINE LLP
Joseph E. Addiego, III
John D. Freed
Dylan R. Hale

By: /s/ Dylan R. Hale
Dylan R. Hale

Attorneys for Defendants
BANK OF AMERICA, N.A.
JPMORGAN CHASE BANK, N.A.


1 **~~PROPOSED~~ ORDER**

2 **PURSUANT TO THE FOREGOING STIPULATION, IT IS ORDERED THAT:**

- 3 1. All current and future deadlines in this case are set aside; and
- 4 2. If no motion seeking to lift the stay has been filed prior to March 1, 2019, the Parties to
- 5 this matter will file a joint case management statement to update the Court regarding
- 6 the status of the litigation.
- 7 3. The initial case management conference shall be continued to 3/12, 2019.
- 8 4. If, upon order of this Court, the stipulated stay is lifted, Defendants shall have 30 days
- 9 to respond to the Complaint.

10 **IT IS SO ORDERED.**

11 Dated this 5th day of November, 2018

12 
13 Honorable . Kandis A. Westmore
14 United States District Court